

## REMARKS

Claims 30 and 32-53 remain in this application. Claim 31 has been cancelled without prejudice. Claims 30, 37, and 38 have been amended. No claims have been added. The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

### **35 U.S.C. §103(a) Rejection – EP 102270 in view of Dukovic et al.**

The Examiner has rejected claims 30-32, 34, 35, 39-43, 45, 46, 48, 50 and 51 under 35 U.S.C. §103(a) as being unpatentable over European Patent No. 1022770 (hereinafter referred to as “EP 102270”) in view of U.S. Patent No. 6,471,845 issued to Dukovic et al. (hereinafter “Dukovic”). Without admitting the appropriateness of combining these references, the Applicants respectfully submit that the present claims are allowable over any combination of EP 1022770 and Dukovic.

Claim 30 recites a method comprising “*storing for at least two days a solution containing a subset of a group consisting of a metal ion, a complexing agent, an ammonium salt, and a strong base, wherein the subset includes at least two components of the group; and nearer to a time of use in an electroless deposition process, using the solution to form a second electroless deposition solution containing the entire group*”.

As previously argued, EP 1022770 does not teach or suggest storing the claimed solution, let alone storing the claimed solution for at least two days. The Examiner appears to have agreed inasmuch as he has stated “*EP1022770 fails to teach storing of the above first solution for at least two days*”.

The Examiner has then argued that it would have been obvious “*to have stored the components of the electroless plating solution of EP 1022770 for at least two days*”.

*since Dukovic et al. disclose that additives of a plating solution may be stored for at least three days before being mixed together to form a plating solution". Applicants respectfully disagree.*

EP 1022770 discusses preparing the electroless plating liquid at column 7, line 53 through column 8, line 7. In particular, it is discussed that *"in order to prepare an electroless plating liquid, a salt of copper or nickel; an amphoteric ion type chelating agent such as glycine; and a chelating agent in the form of an ammonium salt such as ammonium succinate and ammonium malic acid are mixed and pH of the mixture is adjusted by adding aqueous ammonia, and the resultant mixture is further mixed with a reducing agent including no alkali metal ion such as ammonium hypophosphite, hypophosphorous acid, ammonium borohydride, hydrazine and formalin and further with as a surfactant, a non-ionic type surfactant; a cationic surfactant; and an anionic surfactant in the form of an ammonium salt".*

In the section above, clearly there is no teaching or reasonable suggestion that one of the starting solutions used to prepare the electroless plating liquid be a solution that includes at least two components selected from the group consisting of a metal ion, a complexing agent, an ammonium salt, and a strong base. Rather, different starting materials are used. Accordingly, even if one of the starting solutions mentioned in EP 1022770 were placed in a bottle that may be filled as frequently as once every three days as taught in DDDD, it is still a different solution from the particular solution recited in claim 30 that is being stored.

For at least these reasons, claim 30 and its dependent claims are believed to be allowable. Independent claim 45 and its dependent claims are believed to be allowable for similar reasons. Independent claim 48 and its dependent claims are also believed to be allowable.

### **35 U.S.C. §103(a) Rejection – Chebiam et al.**

The Examiner has rejected claims 30-32, 40-42, 45, 46, 48, 50 and 51 as being unpatentable over U.S. Patent Application No. 2003/0113576 issued to Chebiam et al. (hereinafter referred to as “Chebiam”) in view of Dukovic. Without admitting the appropriateness of combining these references, the Applicants respectfully submit that the present claims are allowable over any combination of Chebiam and Dukovic.

Chebiam shows a process flow in Fig. 3 and discusses the process flow at paragraph [0046]. Nowhere is it taught or reasonably suggested to use a starting solution that includes at least two components selected from the group consisting of a metal ion, a complexing agent, an ammonium salt, and a strong base.

For at least these reasons, claim 30 and its dependent claims are believed to be allowable. Independent claim 45 and its dependent claims are believed to be allowable for similar reasons. Independent claim 48 and its dependent claims are also believed to be allowable.

### **Allowable Subject Matter**

The Examiner has indicated that claims 33, 36-38, 44, 47, 49, 52 and 53 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicant respectfully requests that the Examiner consider the remarks herein and allow the present claims.

### **Conclusion**

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

### **Request For Telephone Interview**

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

### **Request For An Extension Of Time**

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

### **Charge Our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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